

A. A. AIMETTE, K2DOX COMMENTS PR DOCKET NO. 93-305 PAGE 1 OF 4

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MARCH 3, 1994

TO: OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

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FROM: ALEXANDER A. AIMETTE, K2DOX
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SUBJECT: COMMENTS ON PROPOSED RULEMAKING PR DOCKET NO. 93-305
VANITY CALL SIGNS FOR THE AMATEUR SERVICE

GENTLEMEN:

ENCLOSED ARE MY COMMENTS CONCERNING THE PROPOSED RULEMAKING
P R DOCKET NO. 93-305 FOR THE ASSIGNMENT OF VANITY CALL SIGNS FOR
THE AMATEUR RADIO SERVICE.

I HAVE TAKEN THE LIBERTY OF FILING FIVE COPIES, FOUR PLUS ONE
ORIGINAL COPY AND HAVE INCLUDED AN ORIGINAL AND NINE COPIES FOR
THE CONVENIENCE OF THE COMMISSIONERS.

I HOPE THESE COMMENTS FROM JUST ONE MEMBER OF THE RADIO AMATEUR
SERVICE HELPS THE COMMISSIONERS IN THEIR DELIBERATIONS.

SINCERELY,



ALEXANDER A. AIMETTE, K2DOX

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COMMENTS BY A. A. AIMETTE, K2DOX ON P R DOCKET NO 93-305:

PROBLEM #1: CHARGES FOR VANITY CALL SIGNS - MUST BE SIMPLE TO COLLECT AND INVOLVE NO COMPLICATED PROCEDURE IE NO CHECKS ETC. MONEY MUST BE EARMARKED FOR FCC AMATEUR SERVICE BUDGET ONLY - NOT A GENERAL TAX. NON-REFUNDABLE IF YOU DO NOT GET A NEW CALL.

ANSWER: EVEN THOUGH OLDER HAMS HAVE WHAT CAN BE CALLED VANITY CALL SIGNS ALREADY FOR WHICH THEY DO NOT PAY, A CHARGE OF \$100 IN TODAYS PRESENT DOLLAR SHORTAGE CLIMATE WOULD NOT BE EXCESSIVE. NOTE THAT THE CHARGE SHOULD BE TO DEFRAY THE COST OF THE APPLICATION PROCESS AND NOT FOR ACTUALLY GETTING A REQUESTED CALL AND NOT FOR THE LICENSE ITSELF. THIS MAKES EVERYONE EVEN- THE OLD TIMERS DO NOT PAY AND THE NEWCOMERS WILL PAY ONLY FOR THE GRANTING PROCESS. APPLICATION FEE NOT REFUNDABLE AND REPEAT APPLICATIONS COULD REQUIRE REPEAT FEES.

PROBLEM #2 HOW TO COLLECT THE CHARGE WITHOUT ALL KINDS OF PROBLEMS WITH CHECKS, CASH ETC.

ANSWER: PAYMENT TO BE INCLUDED WITH THE APPLICATION AND ONLY IN US POSTAL MONEY ORDER FORMAT. END OF COMPLICATIONS.

PROBLEM #3 HOW TO GET INFO ON APPLICATION INTO COMPUTER FOR PROCESSING WITHOUT EXCESSIVE COSTS!

ANSWER:

1. ONE SHEET OF PAPER ONLY-MAKES ITS OWN ENVELOPE
2. USE SPECIAL VANITY CALL FORM PRINTED IN COLOR FOR OPTICAL SCANNER READING ONLY ON INSIDE.
3. MAKE IT FOLDABLE WITH POCKET ON INSIDE FOR POSTAL MONEY ORDER, AND FOLDABLE AS IT'S OWN ENVELOPE FOR MAILING SO THAT DATE OF MAILING IS ON OUTSIDE OF SAME SHEET OF PAPER.

PROBLEM #4 HOW TO PROCESS APPLICATIONS FAIRLY AND SECURELY WITHOUT TAMPERING???

ANSWER PROCESS BY A SEQUENCE OF SELECTION CRITERION:

1. POSTMARK DATE OF APPLICATION --- FIRST COME FIRST SERVED--- WAIT 14 DAYS FOR ALL APPLICATIONS MAILED AS OF THAT DATE TO HAVE BEEN RECEIVED.

SINCE EVERY APPLICATION IS ONE SHEET OF PAPER
WITH POST MARK ON ONE SIDE THIS IS EASY TO CHECK.

2. FOR EACH POSTMARK DATE PROCESS EACH APPLICATION
BY, IN ORDER OF:
 - A) SENIORITY - BY DATE OF FIRST LICENSE OR
 - B) BY LOTTERY -- HAVE EACH APPLICANT FILL OUT
FOUR (4) DIGIT NUMBER (10,000 POSSIBLE) AND
HAVE COMPUTER GENERATE A UNIQUE RANDOM
SEQUENCE OF ALL FOUR (4) DIGIT NUMBERS AND
ASSIGN ORDER OF PROCESSING BY SEQUENTIALLY
COMPARING NUMBER CHOSEN WITH RANDOM ORDER
SEQUENCE. SINCE THE RANDOM ORDER AND THE
PROCESS ORDER IS GENERATED INTERNALLY AND
AUTOMATICALLY NO TAMPERING IS POSSIBLE.

PROBLEM #5 HOW TO LET AMATEURS KNOW WHAT CALL SIGNS HAVE
ALREADY BEEN SELECTED AND AVOID DUPLICATION ETC?

ANSWER: PUBLISH A LIST OF CALLS ASSIGNED EVERY WEEK ON A
SET DAY OF THE WEEK IN THE FEDERAL REGISTER
LISTING THE ASSIGNMENTS AS FOLLOWS:

1. BY WEEK IE " THE FOLLOWING IS A LIST... FOR
THE WEEK OF JANUARY 1 TO JANUARY 7. THEN
SEQUENTIALLY --
2. BY CALL AREAS
3. WITHIN EACH CALL AREA BY LICENSE GRADE IE
EXTRA, ADVANCED, GENERAL ETC.
4. EACH LISTING HAS THE FORMAT "OLD CALL/NEW
CALL "IE K2XYZ/N6AW."

PROBLEM #6 WHAT SHOULD THE APPLICATION FORM CONTAIN IN ORDER
TO MAKE IT SIMPLE AND EASY TO OPTICALLY SCAN?

ANSWER:

1. PRESENT CALL---LARGE FOLLOW-THE-DASH-LETTERS
2. PRESENT CLASS OF LICENSE --CHECK OFF EXTRA,
ADV, GEN ETC.
3. DATE POSTMARKED/MAILED
4. DATE FIRST LICENSED OR FOUR DIGIT LOTTO NUMBER
5. LIST OF (12) TWELVE CHOICES FOR VANITY CALL
6. PLACE FOR SIGNATURE AGREEING TO TERMS OF
APPLICATION AND REQUESTING NEW CALL.
7. FOLDABLE SECTION FOR POSTAL MONEY ORDER.
8. NEW APPLICATION/OLD APPLICATION CHECKOFF.

NOTE: NEW CALL LICENSE SHOULD BE ISSUED FOR NEW PERIOD OF 10
YEARS TO CUT DOWN COSTS. NO OTHER LICENSE CHANGES ADDRESS
ETC. SHOULD BE ON THIS FORM TO SIMPLIFY OPTICAL SCANNING.

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PROBLEM #7 THE APPLICANT DOES NOT GET ANY OF THE VANITY CALL
SIGNS CHOSEN--WHAT TO DO?? HE IS OUT \$100!!

ANSWER: SEND OUT, ONE TIME ONLY AND AUTOMATICALLY, REQUEST
FOR NEW SET OF CHOICES AND PROCESS FREE OF CHARGE.
USE TIME LIMIT OF 90 DAYS FOR REAPPLICATION.

IN SUMMARY: ALL OF THE ABOVE SUGGESTIONS ARE OUTLINED IN THE
BELOW AND MAY BE HELPFUL IN YOUR DECISION PROCESS

COMMENTS: Since the above is simple and can be programmed in
a computer it should be easy and low cost to
process thus:

1. ONE SHEET OF PAPER FOR APPLICATION
2. NO ENVELOPE TO OPEN OR PROCESS
3. OPTICALLY SCANNED INPUT WITH FROM APPLICATION
4. COMPUTERIZED SELECTION OF APPLICATION ORDER
5. COMPUTER SELECTION OF VANITY CALL AUTOMATIC
6. COMPUTER GENERATION OF LICENSE FORM
7. AUTOMATIC REQUEST FOR REAPPLICATION
8. NO OTHER CHANGES ON LICENSE FORM
9. POSTAL MONEY ORDER - LIKE CASH SIMPLE, CHEAP
10. AUTOMATIC LICENSE EXTENSION TO TEN YEAR RENEWAL
11. AUTOMATIC GENERATION OF LIST OF ASSIGNED CALLS FOR
PUBLICATION IN THE FEDERAL REGISTER WEEKLY ALL DONE
BY SAME COMPUTER PROGRAM

END OF COMMENTS A.A.AIMETTE, K2DOX P R DOCKET NO 93-305